

Appln No. 10/713,094  
Amdt. Dated February 9, 2006  
Response to Office Action of December 14, 2005

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**REMARKS/ARGUMENTS**

1. The Applicant has carefully considered the official communication dated December 14, 2005. Applicant respectfully submits that the amendment and the following remarks are fully responsive to the official communication.
2. Page 1 of the specification has been updated: the first line of Page 1 of the specification has been deleted and replaced by a paragraph entitled "Cross-Reference to Related Applications". A replacement Declaration is enclosed. The Applicant submits that this amendment introduces no new matter.
3. The claims have been amended in light of the official communication. It is submitted that no new matter has been added as a result of the amendment.
4. In paragraphs 4 and 5, the Examiner has rejected various claims under 35 U.S.C. 103(a) as being obvious in light of Ikeda et. al (US 5,530,792) in view of Mishima et.al (US 6,191,405).
5. We propose amending claim 1 to further distinguish the present invention from those inventions described in the cited documents.
6. Claim 1 now defines that the "pagewidth printhead ha(s) at least one fixed printhead chip that spans an expansive print area of a page". Furthermore, claim 1 further defines that dot data is communicated to the printhead chips "for printing along the span of the expansive print area". The term "fixed" plainly means immovably secured. Furthermore, the term "expansive" plainly means broad in extent. Accordingly, the cited documents neither disclose nor suggest using fixed printhead chips spanning an expansive area to print along the span of the expansive print area.
7. Elaborating further, Ikeda et. al. discloses a printer (see Figure 3 and line 64 of col. 4 to line 12 of col. 5) comprising a head cartridge 9 with a printing head for printing in a localized print area. The head cartridge is fast with a carriage 11 which moves along the page (as indicated by arrow S) to achieve printing along the span of an expansive print area. Therefore, Ikeda et. al. teaches the use of a movable printhead to print across an expansive

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print area which is a direct teaching away from the invention defined by claim 1. A moving printhead not only requires the use of additional motors and parts to implement movement, but is also more prone to blurring during printing than a fixed printhead. Ikeda et.al. does not suggest using a fixed printhead which can print along the span of an expansive print area and, accordingly, claim 1 is not obvious in light of the teachings of this document.

8. Mishima et.al. relates to an image processing apparatus in a photocopier. A laser diode 61 emits a laser beam which is deflected to scan along a photoconductor drum 71 to form an image which, in turn, is transferred to paper (see lines 2 to 16 in col. 5). That is, the laser beam moves along the photocopier drum when forming the image. In contrast, claim 1 recites that fixed printhead chips are used to print across an expansive print area which, for reasons previously discussed, is converse to the teachings of Mishima et.al.. Accordingly, the present invention would not be obvious in light of Ikeda et. al. in view of Mishima et.al.

9. Furthermore, Mishima et.al. would appear to fall outside the scope of the present invention which, in turn, is generally related to printing and not photocopy reproduction. It will be appreciated that printing using printhead chips is quite distinct from reproduction using laser optics and requires distinctly different knowledge. Accordingly, we respectfully submit that Mishima et.al. is not relevant for the purposes of 35 U.S.C. 103(a).

10. In addition to the foregoing, Matsushima (JP 01048124) does not relate to printing not disclose using printhead chips at all. Accordingly, claim 1 is not obvious in light of this document, whether considered separately or in light of Ikeda et. al (US 5,530,792) and Mishima et.al (US 6,191,405).

11. We respectfully submit that defendant claims 2 to 7 are not obvious in light of the cited documents, whether taken alone or in combination with each other, as these documents include the features of claim 1 which in turn is not obvious.

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It is respectfully submitted that all of the Examiner's objections have been successfully traversed. Accordingly, it is submitted that the application is now in condition for allowance. Reconsideration and allowance of this application are courteously solicited.

Very respectfully,

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